

- 24 Responds to the DOJ's concerns regarding late wholesale bills and double-billing.
- 27 This paragraph contains no "new" information and directly responds to the DOJ's comments regarding the alleged need for additional clarity in Ameritech's performance measure definitions.
- 28-30 These paragraphs contain no "new" information and directly respond to the DOJ's comments regarding alleged deficiencies in how Ameritech measures its "due date met" performance.
- 42 This paragraph contains no "new" facts and directly responds to the DOJ's assertions regarding the purportedly need for average installation interval performance measures.
- 45 This paragraph contains no "new" facts and directly responds to the DOJ's assertions regarding the purported need for and lack of comparative performance measures between Ameritech's retail repair performance and unbundled loop repair performance.
- 48, 49 These paragraphs contain no "new" facts and directly respond to the DOJ's comments regarding the purported need for Ameritech to report performance information for held orders and for electronic order flow-through rates.
- 51, 52 These paragraphs directly respond to the DOJ's comments regarding the purported need for and deficiencies in Ameritech's provision of billing accuracy information and unbundled loop repeat trouble report data.
- 61
Schedules 4, 5 This paragraph directly responds to the DOJ's assertion that Ameritech lacks adequate manual OSS capacity in connection with Ameritech's processing of CLEC Orders.
- 63 This paragraph directly responds to the DOJ's assertion that Ameritech's performance in returning FOCs on time is inadequate.
- 64 This paragraph directly responds to the DOJ's assertion that Ameritech's performance in timely delivering AEBS bills need improvement.
- 66, 68-73, 75-76,
79, 81-83, 89, Responds to DOJ's and TCG's arguments regarding end office integration ("EOI") trunk blockage. In particular, responds to

- Att. 6 DOJ's conclusion that the EOI trunk blockage data Ameritech submitted with its initial application shows that Ameritech failed to provide interconnection in compliance with the checklist, and explains how DOJ appeared to have misinterpreted and misunderstood the data (e.g., by taking regional data rather than Michigan-specific data, not appreciating the improvement over time, assuming that trunk blockage necessarily results in call blockage).
- 91 Responds to TCG's claim that TCG has been experiencing out-of-parameter EOI trunk blockage.
- 93-94 Responds to TCG's and DOJ's charge that there is excessive trunk blockage within Ameritech's network. The May data was unavailable when Ameritech filed its initial application, and further rebuts TCG's and DOJ's charges. Also responds to DOJ's concern that Ameritech does not furnish sufficient data to CLECs.
- 101 Responds to TCG's and DOJ's charges that Ameritech has not done enough to solve the EOI blockage problem, and, in fact, shows that many of TCG's and DOJ's concerns have been mooted.
- 103-106 Responds to TCG's claim that Ameritech has refused to give direct trunking to TCG, and also to TCG's charge that it has earnestly tried to resolve the trunk blockage problem, only to be hindered by Ameritech. Mr. Mayer explains why TCG (and not Ameritech) has been the source of delays.
- 112 Responds to TCG's charge that Ameritech has hindered TCG's attempt to obtain two-way trunking, and refers to a June 17 letter showing that the parties have reached an agreement on this subject.

5. Mickens Reply Affidavit

Paragraph(s)

Response

- 26-28 These paragraphs directly respond to the MPSC's comments concerning the need for additional OSS performance measures and reports.
- 32 This paragraph does not contain any "new" facts and directly responds to the assertions of AT&T, MCI, LCI and other Ameritech competitors that Ameritech's performance

measurement plan is purportedly inadequate. Notably, AT&T does not seek to strike this paragraph.

- 39 This paragraph does not contain any “new” facts and directly responds to assertions made by AT&T affiant Pfau. Only AT&T seeks to strike this paragraph.
- 42 With one minor exception, this paragraph does not contain any “new” facts; moreover, it directly responds to assertions made by AT&T affiant Pfau regarding the alleged need for a comparative “speed of answer” performance measure.
- 43 This paragraph directly responds to assertions by AT&T affiant Pfau regarding the alleged need for and lack of billing accuracy and timeliness performance measures and data.
- 45 With one minor exception, this paragraph does not contain any new information; moreover, it directly responds to assertions by AT&T affiant Pfau regarding the alleged need for and lack of clear performance measure definitions and audit requirements.
- 53, 54 These paragraphs directly respond to assertions by TCG and its affiants regarding trunk blockage issues.
- 56 This paragraph does not contain any “new” facts and directly responds to assertions by AT&T, MCI and other Ameritech competitors regarding alleged deficiencies in Ameritech’s actual performance and the impact of those alleged performance deficiencies on local exchange services competition in Michigan.
- 58-61 These paragraphs directly respond to assertions by Brooks Fiber regarding alleged deficiencies in Ameritech’s unbundled loop provisioning performance vis á vis Brooks Fiber.
- 67, 68 These paragraphs contain virtually no “new” information; moreover, they directly respond to Brooks Fiber’s assertions regarding Ameritech’s assignment of due dates, Ameritech’s unbundled loop provisioning performance and Ameritech’s activities in connection with facilitating Brooks Fiber’s use of Ameritech’s electronic pre-ordering interface.
- 73 This paragraph contains virtually no “new” information; moreover, it directly responds to TCG’s allegations regarding Ameritech’s performance in provisioning TCG’s trunk orders.

75-77	These paragraphs correct previous data reporting errors and directly respond to TCG's assertions regarding Ameritech's trunk blockage performance.
79	This paragraph contains no "new" information and directly responds to TCG's assertions regarding Ameritech's performance.
80-81	These paragraphs contain little "new" information; moreover, they directly respond to allegations by AT&T affiant Pfau regarding purported deficiencies in Ameritech's performance in the areas of new service failures, repeated maintenance, trouble report rates and due dates not met.
84	This paragraph directly responds to assertions by AT&T, LCI and other competitors regarding (1) a purported lack of timeliness in Ameritech's delivery of AEBS bills and (2) Ameritech's purported failure to address the problem.
85	This paragraph merely lists, for ease of reference, the May performance reports attached to the affidavit.
94, 96	These paragraphs contain virtually no "new" information; moreover, they directly respond to allegations made by AT&T affiant Connolly regarding purported deficiencies in Ameritech's Resale Services Ordering Guide with respect to (1) PBX Trunk Hunting instructions and (2) specifications for ordering complex white pages directory listings. Notably, AT&T does not seek to strike these paragraphs.
Attached Schedules	These Schedules provide factual and performance data back-up for the specific responses that Mr. Mickens provides in his affidavit to the comments and allegations of the MPSC, the DOJ, Ameritech's competitors and their affiants; they are directly responsive to the assertions and factual materials presented by those commenters.

6. Rogers Reply Affidavit

Paragraph(s)

Response

5-6	Responds to CLECs' and the DOJ's numerous references to the March 6, 1997 Illinois Commerce Commission ("ICC") Hearing Examiner's Proposed Order ("HEPO") as it relates to OSS by
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summarizing the superseding findings from the June 18, 1997 ICC HEPO.

- Sch.1 This schedule is a transcript of the Public Service Commission of Wisconsin's Open Meeting (April 3, 1997), published in the Utility Regulation Report. The exact same transcript was cited and attached as a schedule to MCI's own comments in this docket.
- 9, 12-13, 26, 28-29 Responds to assertions by AT&T, MCI, Sprint, the DOJ and others that the testing, review by outside experts and commercial use that Ameritech's OSS interfaces have undergone do not show operational readiness.
- 15 Responds to AT&T's argument that there are two fundamental defects in Ameritech's OSS.
- 18 Responds to Sprint's attempt to link operational readiness with the development and implementation of national standards.
- 21 Responds to criticism that the ASR interface for ordering unbundled network elements is non-standard, in particular MCI's allegation that Ameritech should have implemented Issue 7.0 of the TCIF customer service guidelines sooner.
- 25, Sch.2 Responds to the DOJ's expressed intent to monitor the implementation of Issue 7.0 of the TCIF customer service guidelines, which will allow for ordering unbundled loops via EDI (Evaluation, Appendix A, at A20-21), and to MCI's charge that ongoing meetings between Ameritech and CLECs (including AT&T, MCI and others) toward implementing Issue 7.0 will do little good (King Aff. ¶ 129).
- 34 Responds to MCI's claims that only six users can use the preordering interface at once and that the legacy systems can handle only eight simultaneous transactions.
- 36, Sch.3 Responds to issues raised by AT&T regarding the availability of the street address guide ("SAG") via File Transfer, and attaches a Public Notice of Network Change describing an on-line, real-time version of the SAG to be implemented in 10/97.
- 38-42 Responds to the criticisms of AT&T and others regarding manual processing, in particular their allegations regarding change orders ("860s"), new orders ("N orders") and CSR time-outs.

- 58 Responds to MCI's complaint that order rejects only identify one error, and describes the upgrade tested June 2, 1997 and implemented June 30, 1997 that resolved this issue. MCI itself noted in its comments in this docket (King Aff. ¶ 145) that Ameritech was planning to implement this upgrade as of June 30, 1997.
- 62, Sch.4 Responds to AT&T's claim that its order volumes have not fluctuated widely.
- 67 Responds to MCI's criticism of the EDI ordering interface by describing MCI's testing of EDI release 3.2.
- 68 Responds to complaints by AT&T and others regarding "late" firm order confirmations ("FOCs").
- 71-72, 75, 77-78, Sch.5 Responds to complaints by AT&T and MCI (King Aff. ¶¶ 140-43) about jeopardy notifications and order completion notifications ("865s").
- 79, 81 Responds to criticisms by the DOJ and others regarding the testing and use of the graphical user interface ("GUI") tool in connection with the repair and maintenance interface, in particular its use by Ameritech's payphone affiliate.
- 86, 88-89, 91 Responds to numerous complaints about double-billing, in particular AT&T's allegation that Ameritech has attempted to evade responsibility for resolving double-billing and issuing refunds.
- 90 Responds to AT&T's claim that split area codes cause double-billing.
- 96 Responds to complaints about electronic and manual capacity.
- 98 Responds, in a concluding summary, to all of the issues raised by the DOJ and the CLECs.

7. Reply Affidavit of Debra J. Aron

<u>Paragraph(s)</u>	<u>Response</u>
6 and 98-105	These paragraphs respond directly to the assertions of AT&T affiant James Henson and MCI affiant August Ankum that Ameritech's cost studies fail to comply with the Commission's TELRIC methodology and result in rates that exceed the cost-based rates required by Section 252 of the Act. In these paragraphs, Dr. Aron demonstrates (a) that the cost studies do in fact adhere to the Commission's prescribed methodology and (b) that, if anything, the methodology and assumptions employed by Ameritech are overly conservative and result in rates that are "too low."
23	This paragraph responds directly to MCI affiant Ankum's assertion that Ameritech's "fill factors" effect what amounts to an improper "inter-generational transfer" of costs from future to current customers. (Ankum Aff. at 29-31). In fact, as Dr. Aron demonstrates in this (and other paragraphs), any spare capacity recognized in Ameritech's studies is used to satisfy the growth in demand from current customers.
52-61	These paragraphs respond directly to the assertions of MCI affiant Ankum (see Ankum Aff. at 45) that the appropriate depreciation rates for use in forward-looking cost studies under the Act are those determined in a pre-Act Commission proceeding. In these paragraphs, Dr. Aron demonstrates that the Commission-prescribed lives are not economic lives in today's environment and that their use here would result in rates below true forward-looking economic costs.
63-69 and Schedules 3 and 4	These paragraphs respond directly to the incredible assertions of MCI affiant Ankum that the increase in competition in local telecommunications markets will not affect the pace of technological change and innovation, and therefore will not accelerate obsolescence and shorten economic lives. (See Ankum Aff. at 46.) In these paragraphs and the accompanying schedules, Dr. Aron demonstrates that precisely the opposite is true, as the financial markets have already demonstrated.
73 and 74	These paragraphs respond directly to the assertions of AT&T affiant Henson and MCI affiant Ankum that Ameritech does not face a significant risk of stranded investment -- particularly on the

wholesale side of the house -- in the increasingly competitive local market. Dr. Aron lays out in these paragraphs admissions by AT&T that confirm that the risk is real, that it is growing and that, if anything, it is greater for wholesale operations than it is for Ameritech's retail units. This is the real reason MCI wants these paragraphs stricken -- they demonstrate that the IXCs are talking out of both sides of their mouth.

78-85

These paragraphs respond directly to the assertions of both AT&T affiant Henson and MCI affiant Ankum that increases in competition in local telecommunications markets will not affect the pace of technological change and innovation, and therefore won't accelerate obsolescence and shorten economic lives. (See, e.g., Ankum Aff. at 46.) These paragraphs lay out assertions made by AT&T itself in earlier Commission proceedings that directly contradict the positions AT&T and MCI are taking here. The real reason for the motion to strike these paragraphs is to excise from the record in this proceeding these damaging admissions.

8. Crandall/Waverman Joint Reply Affidavit

Paragraph(s)

Response

17 and Appendix 2

Paragraph 17 and Appendix 2 respond directly to Professor Hall's contention (§ 126, including Table) -- based upon purported confidential IXC data which should be ignored because such data is not subject to verification -- that revenue per minute trends show that the long distance market is already competitive and further entry could confer no benefits upon consumers. Crandall/Waverman show that, even if Hall's factual assertions were correct, those assertions actually support the conclusion that residential rates remain substantially above competitive equilibrium levels.

19

This paragraph responds directly to the contention by Hubbard and Lehr (§ 31 and Figures 3-5) -- based upon purported confidential data which should be ignored because such data is not subject to verification -- that there have been substantial benefits to "all types of consumers."

30-33 and Table 3

Paragraphs 30-33 and Table 3 (as well as paragraph 29) respond directly to Professor Hall's assertions (§§ 241, 244) that the "Connecticut long-distance customer has gained no meaningful

advantage from SNET's control of a long-distance carrier in the market" and that there have been "no meaningful benefits in the form of reduced prices." Paragraphs 29-33 and Table 3 summarize the benefits to consumers of SNET's entry in Connecticut, including lower intraLATA rates and one-second billing.

9. Edwards Reply Affidavit

Because AT&T did not move to strike any of the Edwards reply affidavit, we discuss only the paragraphs listed by the joint movants.

<u>Paragraph(s)</u>	<u>Response</u>
7, 8	These paragraphs directly respond to the asserts of MCI and other Ameritech competitors that (1) local services competition in Michigan is de minimis and (2) the growth rates of new entrants are misleading and not sustainable over time.
20 Attachment 6	This paragraph contains no "new" information and directly responds to MCI's assertion that the only issue addressed in the BFR process is technical feasibility and that most UNE combination requests can and should be processed without a BFR.
25	This paragraph directly responds to the MCI assertion that Ameritech is unable to provide and has not provided physical collocation.
30 Attachment 8	This paragraph directly responds to TCG's assertion that Ameritech had rejected TCG's request for two-way trunks.
50-52 Attachments 16-26	These paragraphs consist primarily of argument and directly respond to the assertions of AT&T, MCI and other Ameritech competitors that "common transport" is an unbundled network element and a Section 271 checklist requirement. The referenced attachments directly respond to the assertions by Ameritech competitors that the FCC purportedly resolved the "common transport" issue in its First Report and Order.
80	This paragraph directly responds to MCI's assertion that CLECs have sought to order the platform with "unbundled" transport.
129	This paragraph directly responds to Brooks Fiber's mischaracterization of Ameritech's Valuelink contracts and to

Brooks Fiber's and others' assertion that Ameritech was foreclosing competition through its Valuelink contracts.

10. Gilbert/Panzar Reply Affidavit

Because AT&T does not seek to strike any portion of this affidavit, we discuss below only the portions of the affidavit listed by the joint movants.

<u>Paragraph(s)</u>	<u>Response</u>
58	This paragraph directly responds to the assertions of MCI affiant Hall that the U.S. cellular industry is an uncompetitive capacity-constrained duopoly.
62-64	This paragraph directly responds to the assertions of MCI and AT&T affiants Hall, Warren-Boulton, Baumol and others that ILECs can and do discriminate in downstream markets.

11. Heltsley/Hollis/Larsen Joint Reply Affidavit

Because AT&T did not seek to strike any portion of this affidavit, we discuss below only the portions of the affidavit listed by the joint movants.

<u>Paragraph(s)</u>	<u>Response</u>
20, 23 Schedules 1-5	These paragraphs and the attached schedules directly respond to Brooks Fiber's assertion regarding its day-to-day business relationship with Ameritech and Ameritech's purported failures to promptly respond to Brooks Fiber's concerns and complaints.
29-35 Schedules 7, 8, 8.1	These paragraphs and the attached schedules directly respond to Brooks Fiber's assertions that Ameritech's unbundled loop provisioning performance vis-a-vis Brooks Fiber was poor.
65, 66	These paragraphs directly respond to Brooks Fiber's assertions that (1) it never received from Ameritech a copy of Ameritech's Ordering and Product Guides and (2) it was never given access to Ameritech's web site.
68	This paragraph directly responds to Brooks Fiber's assertions regarding Ameritech's Valuelink contracts.

12. Jenkins Reply Affidavit

Because AT&T did not seek to strike any portion of this affidavit, we discuss below only the portions of the affidavit listed by the joint movants.

<u>Paragraph(s)</u>	<u>Response</u>
16-72, 75 n.8, 78 Schedules 3-5, 8	These paragraphs provide necessary background information for understanding and directly responding to TCG's assertions regarding purported deficiencies in Ameritech's provision of 911 service, including assertions regarding a Complaint filed with the MPSC by the city of Southfield, Michigan.

13. MacAvoy Reply Affidavit

<u>Paragraph(s)</u>	<u>Response</u>
9-10 and Tables One and Two	Paragraphs 9-10 and Tables One and Two respond directly to assertions by Berheim, Ordoover & Willig (pp. 92-93 and manuscript at p. 55), Hubbard and Lehr (pp. 66-69) and Hall (pp. 47-48, 71-72) that MTS prices are irrelevant, that MacAvoy overstates long-distance prices, and that MacAvoy's price index is not representative. In paragraphs 9 and 10 of his affidavit (as well as in other paragraphs), MacAvoy responds to these claims by presenting data on the actual prices paid for a call and showing that price-cost margins have risen throughout the 1990s.
12-13 and Tables Three and Four	Paragraphs 12-13 and Tables Three and Four (as well as Paragraph 11) respond directly to the assertions by Berheim, Ordoover & Willig (pp. 92-93), Hall (pp. 46-50), and Banks (pp. 5-6) that MacAvoy's analysis fails to take account of discount plans. In paragraphs 11-13 and Tables Three and Four, MacAvoy rebuts the argument by these affiants for AT&T, MCI and Sprint by showing that the trend in price-cost margins for the discount plans is the same as the trend for standard plans.
16	This paragraph responds directly to Berheim, Ordoover & Willig's unsupported contention (pp. 87-89) that long-distance subscribers skip from plan to plan and to Hall's unsupported contention (p. 49) that "most customers take advantage of flat-rate low-price plans." Ameritech obviously has the right to offer concrete evidence to rebut the unsupported assertions of affiants for the long-distance providers.

35-36 and Tables Six
and Seven

Paragraphs 35-36 and Tables Six and Seven (as well as
paragraph 34) respond directly to Professor Hall's criticisms
(pp. 83-84) of MacAvoy's consumer benefit calculation.

14. Mayer Reply Affidavit

All of the paragraphs discussed below respond to the affidavit of AT&T witness Mr.
Lester. Notably, AT&T does not seek to strike any portion of Mr. Mayer's reply affidavit.

Paragraph(s)

Response

8

Responds to AT&T's claim that the lack of a final, signed
implementation plan between Ameritech Illinois and AT&T has
been a road block to processing Structure access requests; notes
that negotiations are under way and that Ameritech Michigan
continues to process requests for access despite the lack of a
signed plan.

9-10, 12-13

Responds to AT&T's argument that it has experienced problems in
its access requests from Ameritech within Illinois; notes that many
of the problems that AT&T claims that it has encountered are due
to its own actions. Also provides data regarding access to
Structure that has been provided to AT&T, as well as others, in
Michigan, Illinois and throughout the Ameritech five-state region,
to further rebut AT&T's claims.

28

Responds to AT&T's claim that Ameritech Michigan has not
established adequate procedures for making route planning
information available to it; notes that specific intervals have been
proposed to AT&T regarding information requests.

15. Quick Reply Affidavit

Paragraph(s)

Response

10-18

Provides a description of Ameritech Michigan's collocation prices
in direct response to assertions by MCI regarding purported
deficiencies in those prices. Specifically provides a description of
the floor space charge, Central Office Built Out (COBO) charge
and the enclosure charge in direct response to criticisms and
mischaracterizations of those charges by MCI affiant Ankum.

16. Wilk/Fetter Joint Reply Affidavit

Paragraph(s)

Response

7

This paragraph expressly rebuts MCI's argument in its comments that the 1996 Act purportedly requires the existence of "effective [local] competition" before a Section 271 application can be granted. The paragraph refers to a 1985 California proceeding as part of the affiants' explanation of several reasons why the FCC should not adopt the "effective competition" standard proffered by MCI and other competitors.

17. Wynn Reply Affidavit

Paragraph(s)

Response

5-11

These paragraphs summarize the interconnection negotiations between Ameritech and AT&T as foundational background for the discussion that follows (in ¶¶ 13-36) in response to three specific aspects of the negotiations that are discussed by AT&T affiants Bryant, Medlin and others. Because no challenge is made to ¶¶ 13-36, ¶¶ 5-11 should be included in the record as foundation for that unchallenged testimony. Notably, it is MCI et al. that move to strike this material concerning AT&T's negotiations with Ameritech; AT&T raises no objection.

Exh. A

This letter is part of the account of the AT&T/Ameritech negotiations that is told in ¶¶ 5-11 of the Affidavit, and should be included in the record for the same reasons as those paragraphs.